

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,	)
	)
<i>Plaintiff,</i>	)
	)
	)
v.	)
	)
	)
KEVIN R. ADELL, individually;	)
KEVIN R. ADELL as the Personal	)
Representative of the ESTATE OF	)
FRANKLIN Z. ADELL; RALPH G.	)
LAMETI as Trustee of the	)
ORCHARD LAKE PROPERTY	)
TRUST; ADELL BROADCASTING	)
CORP.; OAKLAND COUNTY	)
TREASURER, STATE OF	)
MICHIGAN,	)
	)
<i>Defendants.</i>	)

**JOINT STIPULATION REGARDING PLAINTIFF'S MOTION FOR  
TEMPORARY RETRAINING ORDER AND PRELIMINARY  
INJUNCTION**

THE PARTIES submit the following Joint Stipulation to update the Court regarding the status of the parties' discussions with respect to Plaintiff's Motion for Temporary Restraining Order and Preliminary Injunction:<sup>1</sup>

<sup>1</sup> For the avoidance of doubt, the Oakland County Treasurer, State of Michigan, has not been involved in discussions related to Plaintiff's Motion for Temporary Restraining Order and Preliminary Injunction.

- 1) On September 11, 2023, the parties held productive discussions regarding the potential resolution of Plaintiff's Motion for Temporary Restraining Order and Preliminary Injunction.
- 2) The parties are engaged in productive discussions to resolve Plaintiff's Motion for Temporary Restraining Order and Preliminary Injunction without further involvement by the Court and counsel have reached an initial agreement in principle with further negotiation necessary.
- 3) The parties require additional time to reduce the parties' current agreement to a written document and negotiate certain details related to such agreement.
- 4) The parties intend to negotiate and file a written document with the Court by Friday, September 15, 2023 that memorializes the terms of the parties' agreement.
- 5) Accordingly, the parties respectfully request that the Court refrain from taking any action regarding Plaintiff's Motion for Temporary Restraining Order and Preliminary Injunction until after the filing of a document memorializing the parties' agreement on or before Friday, September 15, 2023, or earlier if

notified by one or both parties that the parties are unlikely to reach an agreement.

- 6) In addition, even if the Federal Communications Commission granted approval between September 11, 2023, and September 15, 2023, the potential asset sale by and among Adell Broadcasting Corporation and Mission Broadcasting, Inc. will not close on or before Monday, September 18, 2023.

Dated: September 11, 2023

Respectfully submitted,

/s/ M. Todd Welty  
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/s/ Daniel M. Caves (with consent)

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COUNSEL FOR THE PLAINTIFF

**CERTIFICATE OF SERVICE**

IT IS HEREBY CERTIFIED that service of the attached filing has been made through the Court's CM/ECF system on September 11, 2023 to all parties who have entered an appearance in this action and are participating in the Court's CM/ECF electronic filing system.

*/s/ M. Todd Welty*  
M. TODD WELTY  
Todd Welty, P.C.